

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JULIE DALESSIO,  
Plaintiff,

v.

University of Washington  
Defendants

CASE NO. 2:17-cv-00642 RSM

PLAINTIFF'S Statement for merit of claim

**Plaintiff's Statement for merit of claim:**

The University of Washington is continuing post-employment retaliation against Plaintiff, impugning her character and reputation, violating the terms of a settlement agreement, employment laws, public records/Freedom of Information laws, and Civil Rights laws.

The University of Washington deliberately altered Plaintiff's personnel file, removed commendatory documents and added frivolous and derogatory documents, including healthcare information and 35 documents banned by the agreement.

The University of Washington provided exempt, confidential, personal, and identifying information along with defamatory records regarding Plaintiff to the public, including Plaintiff's next door neighbor, causing an invasion of privacy.

PLAINTIFF Dalessio's Statement for merit of claim

The University of Washington has demonstrated negligence in their duty to maintain and preserve employee records, and to appropriately release public records.

The University of Washington is continuing the practice of compiling, improperly redacting, releasing and publishing exempt, personal, confidential, identifying information for purposes that are not in the public interest nor for the intent or purposes of the Freedom of Information Act, in violation of Washington State and Federal Laws, and claiming that all of these actions are authorized “in this exercise of governmental authority entrusted to them by law . . .”

All of these claims are within the statute of limitations, as the claim was filed less than one year from the date of the first violation, and the violations are ongoing.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Dated this 5th day of May, 2017

s/ julie dalessio  
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PLAINTIFF Dalessio's Statement for merit of claim